

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

Case No. 1:17-cv-02989-AT

**MY PILLOW, INC'S AND MICHAEL LINDELL'S MOTION TO
INTERVENE FOR LIMITED PURPOSE**

My Pillow, Inc. and Michael Lindell respectfully move the Court for an order

- (1) permitting them to intervene in this action for the limited purpose of obtaining access to sealed docket filings;
- (2) granting them access to all documents related to Dr. J. Alex Halderman filed under seal in this action (including at minimum ECF nos. 487-1, 487-3, 498, 508-1, 510, 597-1, 855-1, 908-1, 909-1, 910-1, 911-1, 1068, 1108-1, 1130-1, 1156-1, -2, -3, -4, -5), under the condition that they comply with the Court's confidentiality order, ECF no. 477, except that, rather than limiting their use of the information to this action, they be authorized to use the confidential information solely to litigate their claims and defenses

concerning U.S. Dominion, Inc., Dominion Voting Systems, Inc., Dominion Voting Systems Corporation, Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited; and

(3) granting them unrestricted access to a version of ECF no. 1130-1 redacted to remove any “specific details” that Dr. Halderman deems “dangerous.”

WHEREFORE, My Pillow, Inc. and Michael Lindell respectfully request that their Motion be Granted, and that in support of their Motion to Intervene, refer this Honorable Court to the Memorandum of law in support thereof which is incorporated herein by reference, and to consider any and all other supporting evidence of record, and for such other relief as is just and proper.

DATED: March 5, 2022

THE HILBERT LAW FIRM, LLC

By: /s/ Kurt R. Hilbert

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*To Be Admitted *Pro Hac Vice*

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), the undersigned certifies that this motion has been prepared in Times New Roman 14 point font in accordance with LR 5.1.

/s/ Kurt R. Hilbert

Kurt R. Hilbert
Georgia Bar No. 352877

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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2022, a copy of the foregoing **MY PILLOW, INC'S AND MICHAEL LINDELL'S MOTION TO INTERVENE FOR LIMITED PURPOSE** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record for the parties.

/s/ Kurt R. Hilbert

Kurt R. Hilbert
Georgia Bar No. 352877